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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )

Truth-in-Billing )

And )

Billing Formats )

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CC Docket No. 98-170

**REPLY ON CLARIFICATION OR RECONSIDERATION**

Ameritech files its Reply to Comments on its Petition for Clarification or Reconsideration filed in this Docket. Ameritech will show that the Comments confirm that many of the other carriers have the same limitations and circumstances that Ameritech faces and support the relief requested by it. For the reasons discussed by Ameritech in its Petition, and because it is supported by a consensus of the industry, the relief requested by Ameritech should be granted.

On July 26, 1999, Ameritech requested a limited stay until April 1, 2000 of the requirements of the Commission's new billing regulations to the extent that they require billing entities to specially identify each new service provider and non-deniable charges on their bills. Ameritech also requested that the Commission modify its definition of "new service provider" so it applies to providers that have not submitted charges for billing to the customer over the past six month. Ameritech further requested that the Commission clarify that its new billing rules do not apply to custom and complex billings for business customers. Except as to these items, Ameritech fully complied with the Commission's Order by September 6, 1999.

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The parties filing Comments in this phase of the proceeding generally support Ameritech proposals. Specifically, there is general agreement that most carriers will not be able to comply with the Commission's so-called new service provider and deniable/non-deniable requirement until April of 2000 or later.<sup>1</sup> These parties agree with Ameritech that meeting the Commission's requirements will require significant system modifications and person hours<sup>2</sup>, and that attempting to comply before March or April of 2000 could imperil their ability to prevent and promptly correct service and billing problems arising from the so-called Y2K bug.<sup>3</sup> Equally as important, there is strong support for the proposition that the definition of "new service provider" should be modified to include only those providers that have not submitted charges to the customer over the past six months<sup>4</sup>, and for Ameritech's proposal that the new billing rules not apply to custom and complex billings for business customers.<sup>5</sup>

A few parties take this opportunity to make their own pet proposals.<sup>6</sup> These proposals are not a proper subject for comment on another party's Petition and should be rejected as untimely requests for reconsideration. An example is MCI's request that a third party administrator verify presubscribed carrier changes.<sup>7</sup> That proposal has nothing to do with truth-in-billing or the Petitions filed by any party. Moreover, these proposals do not constitute good public policy and represent a thinly disguised attempt to

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<sup>1</sup> See, AT&T at 3; Cincinnati Bell 2-3; Frontier at 2; MCI at 3-5; Mollala at 1-2; SBC at 2-3(March 2000); Time Warner Telecom at 3.

<sup>2</sup> See, AT&T at 2; Cincinnati at 2-3; SBC at 2-4.

<sup>3</sup> Cincinnati at 2; Mollala at 2-3; SBC at 3.

<sup>4</sup> AT&T at 4-5; Cincinnati at 4. See, also, USTA Petition for Reconsideration at 3.

<sup>5</sup> AT&T at 6; Cincinnati at 4; MCI at 9.

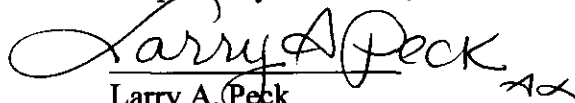
<sup>6</sup> See, AT&T at 5 and ft. nt. 9 (interexchange carriers have no responsibility to identify deniable/non-deniable charges, and have a right to "participate in the decision of how their 'non-deniable' charges are described"), and MCI at ft. nt. 16, and page 11, 13 (interexchange carrier dictates non-deniable language, third party PIC change administrator, LEC solely responsible to provide information regarding new presubscribed carrier, and recover of new billing costs).

<sup>7</sup> MCI at 11.

shift their own responsibilities to another party. For instance, it is ridiculous for MCI to assert that it does not know when it has a new presubscribed customer, when it is in fact submitting a new billing for that customer.<sup>8</sup> This is simply a pretext to shift responsibility and costs to LECs. Finally, the proposal that interexchange carriers dictate non-deniable language is unnecessary and simply not practical. The states govern the terms and conditions regarding deniability of local service and the language on the bill will by necessity reflect the state's rules. Also, it is not practical for a LEC to reflect many different versions of "non-deniable" language on the same bill, one for each interexchange carrier. Moreover, such varying language could be confusing for customers.

As a result, Ameritech's Petition should be granted, as filed.

Respectfully submitted,

A handwritten signature in cursive script that reads "Larry A. Peck". To the right of the signature is a small, stylized mark that appears to be "AL".

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Dated: September 10, 1999

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<sup>8</sup> MCI at 13. See, also Excel at 5 who complains that a CLEC "may not necessarily have a way of identifying when the PC change has been executed by the ILEC, and that the 'new' PC should be listed as 'new' on the customer bill." Obviously, if the CLEC is actually billing for the presubscribed interexchange carrier it knows that it is now the PC.

### CERTIFICATE OF SERVICE

I, Grace Germain, do hereby certify that a copy of the Reply Comments on Clarification or Reconsideration of Ameritech has been served on all parties of record, via first class mail, postage prepaid, on this 10<sup>th</sup> day of September, 1999

  
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